

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE WESTERN DISTRICT OF TEXAS**  
**SAN ANTONIO DIVISION**

THE UNITED STATES OF AMERICA

VS

JOSE ANGEL HERNANDEZ

§  
§  
§  
§  
§

CAUSE NO: 5:19-CR-00797-OLG-1

**DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE, WESTERN DISTRICT OF TEXAS, SAN ANTONIO DIVISION:

Now comes JOSE ANGEL HERNANDEZ Defendant in the above-entitled and numbered cause, by and through the undersigned Counsel, and files this unopposed motion for continuance, and in support of such motion, shows the following:

I.

This cause is presently set for Sentencing on June 30, 2022

II.

Counsel needs additional time review the PSR with the defendant. Additionally, Counsel is continuing to confer with the government on this case.

III.

The undersigned is respectfully requesting a continuance of thirty (30) days in order to exercise the right to effective assistance of counsel as guaranteed by the 6th Amendment to the United States Constitution.

IV.

Assistant United States Attorney Daphne Newaz does not oppose counsel's request for a continuance.

V.

Counsel assures the Court this motion is not made for the purpose of delay but rather in the interest of justice.

**WHEREFORE, PREMISES CONSIDERED**, the defendant prays the Court continue this cause for at least thirty (30) days.

Respectfully submitted,

LAW OFFICES OF ALAN BROWN  
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\_\_\_\_\_/S/\_\_\_\_\_.  
ALAN BROWN  
BAR NO. 03090000

ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that on the 29th day of June 2022, I electronically filed the foregoing with the Clerk of Court using the CE/ECF system which will send notification of such filing to the following:

U.S. Attorney's Office  
601 NW Loop 410, Suite 600  
San Antonio, Texas 78216

\_\_\_\_\_/S/\_\_\_\_\_.  
ALAN BROWN

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**ORDER**

On this the \_\_\_\_ day of \_\_\_\_\_, 2022, came on to be considered Defendant's Unopposed Motion for Continuance, and it appears to the Court that this Motion should be

GRANTED      DENIED

IT IS HEREBY FURTHER ORDERED: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

SIGNED and ENTERED on this the \_\_\_\_ day of \_\_\_\_\_, 2022.

\_\_\_\_\_  
U.S. DISTRICT JUDGE